



Privacy Policy

Version: 1.1

Revision Date: February 2024

Introduction

MV Kelly Limited (“We “or “us” or “our”) is committed to protecting and respecting your personal data and privacy. This privacy policy relates to our use of any personal data we collect from you. Whenever you provide personal data, we are legally obliged to use your information in line with all applicable laws concerning the protection of personal data.

This website is not intended for children, and we do not knowingly collect data relating to children.

Who we are and how to contact us

MV Kelly Limited (registered company number 03062853) is, the data controller and responsible for your personal data.

If you want to request more information about our privacy policy or information regarding data protection you should contact us using the details provided below:

FAO: Privacy Officer
MV Kelly Limited
Cogen Court,
151 Cranmore Boulevard
Shirley
Solihull
B90 4LN

Email: privacyofficer@mvkelly.co.uk

Telephone: 0121 708 5000 and ask to speak to the Privacy Officer

Your rights

You have several rights under data protection laws in relation to your personal data. Your rights are:

The right of access (commonly known as a “subject access request”)

You are entitled to receive a copy of the personal data we may hold about you and to check we are lawfully processing it.

The right to rectification

This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

The right to erasure

This enables you to request deletion or the removal of your personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed

your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

The right to restrict processing

You have the right to 'block' or suppress the processing by us of your personal data in one of the following scenarios:

- If you want us to establish the data's accuracy.
- Where our use of the data is unlawful, but you do not want us to erase it.
- Where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims.
- You have objected to our use of your data, but we need to verify whether we have overriding legitimate grounds to use it.

The right to data portability

You have the right to request transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

The right to object

To processing of your personal data where we are relying on a legitimate interest (or those of a third party) as the legal basis for that particular use of your data (including carrying out profiling based on our legitimate interests). In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your right to object. – You also have the absolute right to object any time to the processing of your personal data for direct marketing purposes.

If you wish to exercise any of the rights set out above, please contact us using the details set out in paragraph 2.

The data we collect about you

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- **Identity Data** includes first name, last name, passports for identification and verification purposes as required by law,
- **Contact Data** includes address, email address and telephone numbers.
- **Technical Data** including IP address, browser type and version, time zone setting and location, operating system and platform, device ID and other technology on the devices you use to access this website. and cookies
- **Usage Data** includes information about how you interact with and use our website, products, and services.
- **Profile Data** includes purchases or orders made by you, your interests, feedback, and preferences.

- **Marketing and Communications Data** includes your preferences in receiving marketing from us and your communication preferences.
- **Special Category Data** includes health data, racial or ethnic origin and biometric data). All such information is collected in accordance with this privacy policy. We have in place appropriate policy documents and/or other safeguards which we are required by law to maintain when processing such data.

How your data is collected

We use different methods to collect data from and about you including:

Your interactions with us.

You may give us your personal data by filling in online forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:

- Request or enquire about our services.
- Use our website including any interactive features, for example to ask a question.
- Interact with us on social media.
- Contact us or give us feedback.
- Request marketing to be sent to you.
- Attend networking events where we are present.

Automated technologies or interactions.

As you interact with our website, we will automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies. Please see our cookie policy [LINK] for further details.

How your data will be used

The law requires us to have a legal basis for collecting and using your personal data. We rely on one or more of the following legal bases:

Legitimate Interests: We may use your personal data where it is necessary to conduct our business and pursue legitimate interests. We make sure we consider and balance any potential impact on you and your rights (both positive and negative) before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law).

Performance of a contract with you: Where we need to carry out our obligations arising from any contracts entered into between you and us or about to enter into.

Legal Obligation: We may use your personal data where it is necessary for compliance with a legal obligation that we are subject to. We will identify the relevant legal obligation when we rely on this legal basis.

Consent: We rely on consent only where we have obtained your active agreement to use your personal data for a specified purpose.

Purposes for which we will use your personal data

We have set out below, in a table format, a description of all the ways we plan to use the various categories of your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Purpose/Use	Type of data	Legal basis
To register you as a new customer	(a) Identity (b) Contact	Performance of a contract with you
To deliver the services: (a) Manage payments, fees, and charges (b) Collect and recover money owed to us	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to recover debts due to us)
To manage our relationship with you which will include: (a) Notifying you about changes to our terms or privacy policy (b) Dealing with your requests, complaints, and queries	(a) Identity (b) Contact (c) Profile (d) Marketing and Communications	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated and manage our relationship with you.
To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Technical (b) Identity (c) Contact	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) (b) Necessary to comply with a legal obligation
To use data analytics to improve our website, products/services, customer relationships and experiences and to measure the	(a) Technical (b) Usage	Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant,

effectiveness of our communications and marketing		to develop our business and to inform our marketing strategy.
To deliver relevant website content to you	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical	Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy.
To send you relevant marketing communications and make personalised suggestions and recommendations to you about services that may be of interest to you based on your Profile Data	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile (f) Marketing and Communications	Necessary for our legitimate interests (to carry out direct marketing, develop our products/services and grow our business) OR Consent, having obtained your prior consent to receiving direct marketing communications

Disclosure of your personal data

We may share your personal data with the parties set out below for the purposes set out in the table above. We require all third parties to respect the security of your personal data and treat it in accordance with the law. We have contracts in place any third party we share your personal data with. This means that they cannot do anything with your personal data unless we have instructed them to do so or use the personal data for their own purposes. They will not share your personal data with any organisation apart from us.

Data Retention

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting, or other requirements.

By law we have to keep basic information about our customers (including Contact, Identity, Financial and Transaction Data for six years after they cease being customers for tax purposes.

Our data retention policy is available for inspection by submitting a written request using the contact details provided in this policy.

International transfers

We do not transfer your personal data outside the UK.

Changes

We keep our privacy notice under regular review. This version was last updated on 16/02/24. It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us, for example a new address or email address

Data Security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used, or accessed in an unauthorised way, altered, or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions, and they are subject to a duty of confidentiality.

Third Party Links

This website may include links to third-party websites, plug-ins, and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy policy of every website you visit.

Complaints

You have the right to complain about the processing of your personal data at any time. Please, contact us using the details provided above to see if we can deal with your concern in the first instance. If you are still unsatisfied you have the right to complain to the [Information Commissioner's Office](#)